

IN THE COURT OF CRIMINAL APPEALS

FOR THE STATE OF TEXAS

LARRY THOMAS CHAMBERS, JR.

FILED
COURT OF CRIMINAL APPEALS
11/5/2019
DEANA WILLIAMSON, CLERK

VS.

NO. PD-0424-19

THE STATE OF TEXAS

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, Keith S. Hampton, and files this his *Motion for Extension of Time to File Appellant's Brief*, pursuant to Rules 10.5(b) and 38.6(d) of the Texas Rules of Appellate Procedure, and in support thereof, would show the Court the following:

I.

Appellant was convicted of possession of a controlled substance, four grams but less than 200 grams, by a jury on April 11, 2018. The jury assessed Appellant's punishment at twenty years' confinement in the Texas Department of Criminal Justice.

II.

Appellant's brief is due November 1, 2019.

III.

Appellant's attorney seeks this first and only extension of time to file his brief. Counsel seeks an additional time of thirty days to file his brief for the following reasons. Counsel has been unexpectedly occupied in a death penalty writ, *Ex parte Paul David Storey* in this Court. Counsel has also been preparing a clemency package for Glen Croft before the Texas Board of Pardons and Paroles, in addition to several other applications for writs of habeas corpus in various counties in Texas.

PRAYER

Wherefore, premises considered, undersigned counsel prays for this Court to extend the time for filing Appellant's brief thirty additional days from today, October 22, 2019, which would make the brief due on Sunday, December 1, 2019. Under Rule 4.1(a), the brief would be due on or before Monday, December 2, 2019. Tex. R. App. Pro. 4.1(a).

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify, by my signature above, that a true and correct copy of the above and foregoing *Appellant's Motion for Extension of Time to File Brief* has been electronically delivered to the Williamson County District Attorney's Office, via Efile and Serve, to Rene Gonzalez, rene.gonzalez@wilco.org, and to Stacey Soule, the State Prosecuting Attorney, stacey.soule@spa.texas.gov, on November 1, 2019.